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Kimberly M. Kirby
Senior Manager
FCC Affairs

July 14, 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 97-137

Dear Mr. Caton:

On Friday, July 11, 1997, Carl Geisy (MCI), Kevin Moss, representing MCI, Steve Murray (MCI), Karen Reidy (MCI), Susan Jin Davis (MCI), Keith Seat (MCI), and the undersigned met with Melissa Waksman of the Policy Division of the CCB, Carol Mattey, Deputy Chief of the Policy Division of the CCB, Sarah Whitesell from the Policy Division of the CCB, and Anu Seam from the Competitive Pricing Division of the CCB. The purpose of the meeting was to discuss unbundled local switching. Attached is a brief outline of the topics discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Kimberly M. Kirby

Kimberly M. Kirby

Attachment

cc: Carol Mattey (CCB)
Melissa Waksman (CCB)
Sarah Whitesell (CCB)
Anu Seam (CCB)

UNBUNDLED LOCAL SWITCHING

MCI Telecommunications Corporation

July 11, 1997

CC Docket 97-137 (Ameritech -MI 271 Application)

MCI

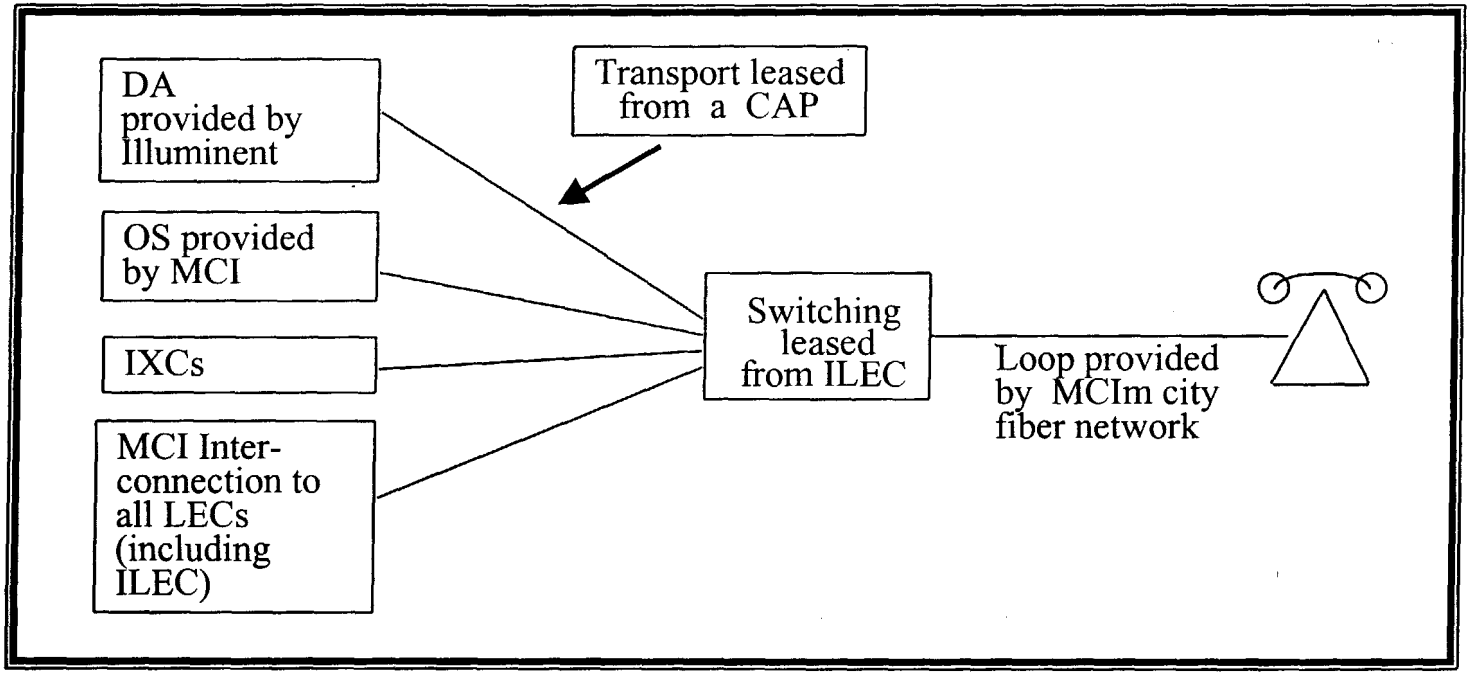
Unbundled Switching

What is it and why do we want it ?

- ➔What is unbundled switching ?
- ➔Component parts
- ➔Not just another element
- ➔Opportunities and Benefits
- ➔Approach
- ➔Chronology
- ➔Current Problems

What is unbundled switching ?

- In the extreme, MCI leases only the switching from the ILEC and provides **ALL** other elements itself or leases them from CAPs and CLECs.



Unbundled Network Elements Migration Matrix

MCI can progressively replace Unbundled Network Elements provided by the ILEC with elements provide by MCI, until the service becomes facilities based. This matrix depicts this migration process.

		Full Unbundled Network Elements	Plus MCI Provides Voice Mail	Plus MCI branded DA, OS	MCI provides own DA, OS & Voicemail	MCI provided DA, OS, Voicemail & Transport to OS platform	MCI provided DA, OS, Voicemail, Transport & all non-local calls. Ilec provides Local switch, 911 & Local calls only	ILEC provides switching, switch'g intelligence, signaling & Intraswitch calls only	ILEC provides switching, signaling & Intraswitch calls only. MCI provides switching intelligence	ILEC provides switching & Intraswitch calls only. MCI provides switching intelligence & signaling	Unbundled Loop	MCI provides feeder & switching (ILEC provides unbundled Distribution)	MCI provides distribution & switching (ILEC provides Unbundled feeder) MCI provides switching & loop	ILEC provides build'g Entr. Facilities.	All Facilities provided by MCI
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Loop	NID/Building Entr. Fac.	X	X	X	X	X	X	X	X	X	X	X	A	X	
	Distribution (cables)	X	X	X	X	X	X	X	X	X	X	X	A	A	A
	Feeder (cables)	X	X	X	X	X	X	X	X	X	X	A	X	A	A
	Concentration (DLCs)	X	X	X	X	X	X	X	X	X	X	A	X	A	A
Local Switching	Customer (Line) Port	X	X	X	X	X	X	X	X	X	A	A	A	A	A
	Vertical Features	X	X	X	X	X	X	X	X	X	A	A	A	A	A
	CPU	X	X	X	X	X	X	X	X	X	A	A	A	A	A
	Network (Line) Port	X	X	X	X	X	X	X	X	X	A	A	A	A	A
	Customized Routing		X	X	X	X	X	X	X	X					
	Billing Data (EMR/EDAS)	X	X	X	X	X	X	X	X	X	A	A	A	A	A
Tandem Switching (for Transit)	Trunk Ports	X	X	X	X	X	X	A	A	A	A	A	A	A	A
	CPU	X	X	X	X	X	X	A	A	A	A	A	A	A	A
Transport	Common	X	X	X	X	X	X								
	Dedicated		X	X	X	A	A	A	A	A	A	A	A	A	A
Signaling & Database	SS7	X	X	X	X	X	X	X	X	A	A	A	A	A	A
	LIDB	X	X	X	X	X	X	X	A	A	A	A	A	A	A
	AIN	X	X	X	X	X	X	X	A	A	A	A	A	A	A
	800 Portability	X	X	X	X	X	X	X	A	A	A	A	A	A	A
Other Services	DA	X	X	X	A	A	A	A	A	A	A	A	A	A	A
	OS	X	X	X	A	A	A	A	A	A	A	A	A	A	A
	911	X	X	X	X	X	X	A	A	A	A	A	A	A	A
	Voicemail		A	A	A	A	A	A	A	A	A	A	A	A	A

X = ILEC Provisioned

A = MCI or 3rd Party Provisioned

Component Parts of Unbundled Switching

- *Line port, trunk port and switching matrix*
- *Customer Billing Records*
- *Carrier Billing*

Platform Trials

- Customized routing

Switched Combination of Elements Trials

  - 411, 0+ and 0-, 611
  - NXX
  - PIC
- Signalling
- MCIm specified Line Class Codes
- Data specification interfaces
- Network Operations Interfaces
- Traffic and Quality of Service Reports
- Transport Interface
- Overflow and Congestion Relief
- Multiple Switch Vendors

Not just another element

- Networks consist of two parts, Transport and Switching. Most of the other unbundled elements are variations of transport.

➔ Transport

- Dedicated
- Common
- Loops
- Cross Connect
- Collocation
- Dark Fiber
- Rights of Way
- Conduits

➔ Switching

Opportunities and Benefits

- ➔ Where MCI has a fiber ring but no switch
- ➔ Relieve congested switches
- ➔ Locations with no switch or fiber ring
- ➔ Timing - Speed to Market
- ➔ Capital cost v's facilities
- ➔ Service Flexibility v's resale - eg. DA, OS, Loop,
- ➔ Vendor Options v's resale - chose optimum provider of each element

Approach

Walk before we can run. Replace different elements in trials with different ILECs.

- ➔ Ameritech Illinois, Beverly - DA, OS, MCI NXXs
- ➔ Ameritech Michigan, Detroit - Loop, Transport, MCI IXC

- ➔ PacBell - DA, OS, MCI NXXs, Intra LATA toll
- ➔ Nynex - DA, OS, MCI NXXs, Voicemail
- ➔ Bell South (unbundled tandem switching) - DA, OS, MCI NXXs,.

Future - LATA wide approach, AIN, incoming traffic

Setting Up the Switch Element - Step 1

End Office..... Service Date.....

	ILEC to Carry	MCI Spec. Custom Routing					
Call Type	This Box Checked if ILEC to Terminate all Calls	Capacity of dedicated transport required	Number of Network Ports Required	"Z" end transport address	Signalling	Directional	Digit Pulsing
DA		none	DS1	none	SS7	One	10
OS		DSO	DSO,	CLLI	MF	One	7
Emergency Services	✓						
Local Inter-Switch to MCIm NXX		none	DS1	CLLI	SS7	Two	10
Localto ILEC NXX	✓						
Local to CLEC NXX		DS1	DS1	CLLI	SS7	Two	10
Intra LATA PIC to MCIT		none	DS1	CLLI	SS7	One	10
Intra LATA PIC to AT&T	✓						

Chronology

Illinois - Beverly

- 23 May 97 - BFR submitted by MCI
- 2 June 97 - Follow-up meeting
- 17 June 97 - Pricing Meeting
- 26 June 97 - Partial BFR response from AIT
- 11 July 97 - MCI place initial network setup orders using ASRs and Questionnaires

Michigan - Detroit

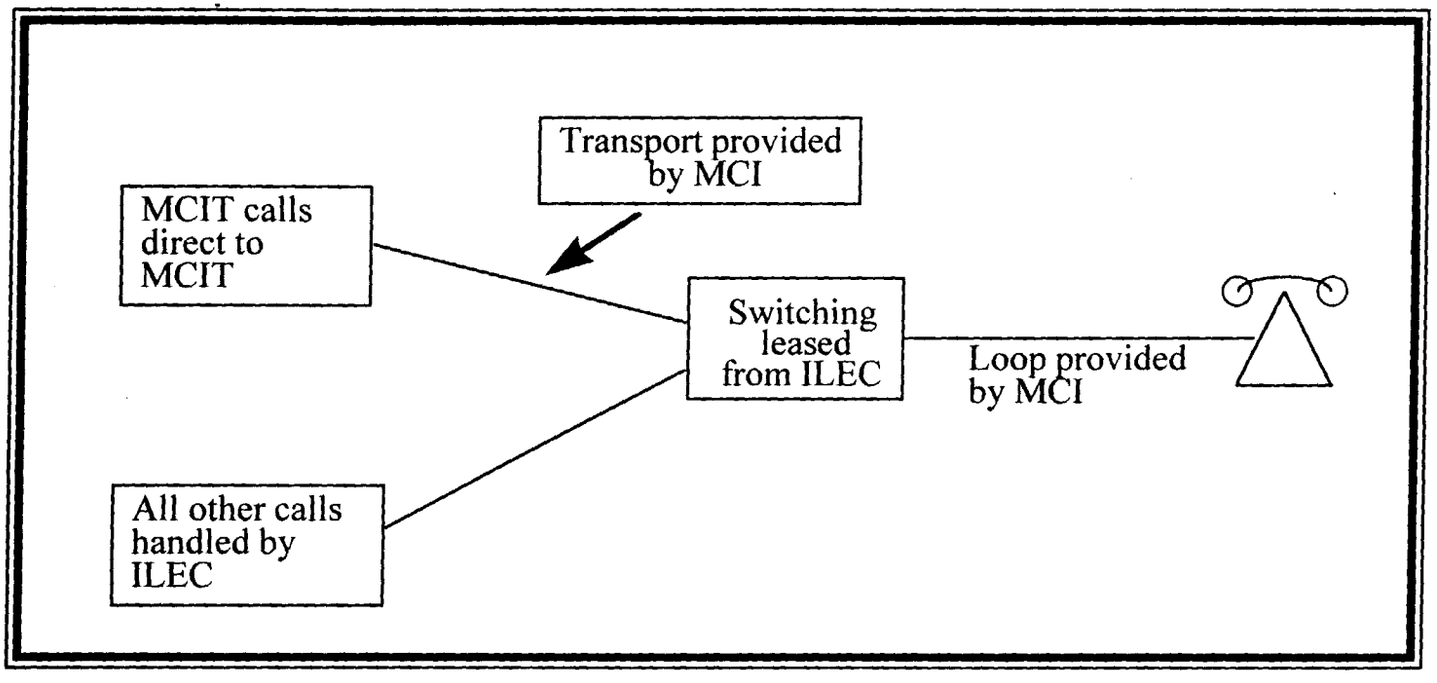
- 20 June 97 - MCI submitted Line Class Code Questionnaires
- 20 June 97 - MCI submitted order for line side port
- 25 June 97 - MCI submitted ASR for trunk side port
- 7 July 97 - MCI requested due date
- 21 July 97 - AIT FOC date for trunk side port

MCI

Current Problems in MI and IL

- NRCs excessive and unclear
- No specification of applicable call charging structure
- AIT required BFR Process Unnecessary
- No Ordering Process
- No timescales
- No traffic reporting
- No Data change process
- Refuse to allow overflow routing for congestion relief and blockage

Detroit Michigan Trial



Beverly Illinois Trial